



January 14, 2004

Ms. Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Room TW-A325  
Washington, DC 20554

Dear Ms. Dortch:

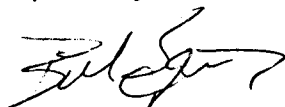
Blackfoot Communications, Inc. f/k/a Montana Wireless, Inc. ("BCI") hereby submits its quarterly report on the implementation of Text Telephone ("TTY") access to E911 over its digital wireless network, pursuant to the Commission's *Fourth Report and Order* in CC Docket No. 94-102, released December 14, 2000.

BCI is committed to complying with Commission requirements regarding TTY. However in order to comply with this government mandate, BCI must upgrade its system. As the Commission is aware from BCI's previous filings in this docket, due to Nortel's discontinuation of its support of BCI's current dual-load wireless and wireline traffic switch, BCI purchased a second switch and must split the traffic from the existing switch. Because of Nortel's decision to no longer support its dual mode switch, BCI has been put in the unusual circumstance of having to perform a technically complex switch split seamlessly.

Before BCI can proceed with the complex implementation task ahead of it, however, it must obtain the necessary software and hardware from its longtime vendor, Nortel. Once the new switch is installed, BCI must install a second software upgrade that will permit it to split the traffic from the single switch, and accomplish that split. The project completion date is currently scheduled for March 26, 2004. BCI will then enter a thirty day acceptance period, during which wireless TTY will be tested.

BCI remains committed to complying with Commission requirements regarding TTY.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Bill Squires", with a stylized flourish at the end.

Bill Squires  
Senior Vice President – General Counsel  
Blackfoot Communications, Inc. f/k/a Montana Wireless, Inc.

Montana Wireless, Inc. d/b/a Blackfoot Communications, Inc.  
E911 TTY Device Capability Report as of January 14, 2004

**Development Activities**

1. **Network Infrastructure Software Development** – We have continued discussions with our network vendor, Nortel. They indicate that TTY compatible software will be in the MTX 10 software load. This software load cannot be installed until the current switch is split and a new switch installed.  
**Handset Development and Testing Plans** – We currently offer our customers Kyocera KE 414, Kyocera 2325 and Nokia 3585i, Nokia 3586i, and LG VX4400 TTY capable handsets. At this time we continue to evaluate new models. These models are reportedly TTY compatible and we would expect to offer them for sale as well, pending positive evaluations. The new handsets would replace current equipment that may not be TTY and/or E-911 capable. However, the TTY/E-911 feature will not become functional until our system upgrade is completed. To date, we have not had a single request for TTY capable equipment.
2. **Beta Testing and Lab Testing** – We are a small rural carrier, and are looking to our equipment manufacturers to conduct full beta and lab testing of network software, handsets and infrastructure equipment. However, we will test the equipment we procure as soon as it is available, to make sure it meets the manufacturer's specifications.
3. **Release and General Availability to Carriers of Network Infrastructure Software** – Unable to determine a firm date at this time with any manufacturer or vendor.
4. **Availability to Carriers of Full Digital Acceptance Test Units** – Unable to determine a firm date at this time with any manufacturer or vendor.
5. **Efforts Toward Achieving Digital Wireless Solution compatibility with enhanced TTY** – We must upgrade our switch, split the switch and load additional software. We issued a purchase order for the project and a Nortel project manager has been assigned. A firm implementation schedule has been developed. The project completion date is currently scheduled for February 26, 2004. We will then enter a thirty day acceptance period, during which wireless TTY will be tested.

## **Testing and Deployment Activities**

7. **Carrier Coordination of Testing with PSAP** – We will test with the PSAPs in the areas where this service will be deployed. Any coordination with the PSAP will be done on a case-by-case basis, in cooperation with the relevant PSAP personnel.
8. **Carrier Testing Activities, Including Field Testing, Consumer and End-to-End Testing, and Other Necessary Tests** – Each of these will be tested once equipment, software availability, deployment, installation, and turn up are completed.
9. **Retail Availability of Necessary Consumer Equipment** – As indicated above we are currently offering five different models. However, the TTY feature will not become functional until our system upgrade is completed. To date, we have not had a single request for TTY capable equipment.
10. **Geographic Scope of Network Infrastructure Development** – Since our network has only one switch, as hardware becomes available, it will be deployed across our whole network. Likewise, as TTY compliant handsets become available we will offer them in all retail locations.